

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 5:25-cv-00462-G
	)	
PLAZA HOTELS, LLC; STEVE KETTER;	)	
MICHAEL WILEY; OKC AIRPORT ES, LLC;	)	
ESH STRATEGIES FRANCHISE, LLC;	)	
KAJAL HOSPITALITY, INC; JALIYAN	)	
HOSPITALITY, INC; SUPER 8 WORLDWDE,	)	
INC; RAJ KRUPA HOTEL, LLC; DAYS INNS	)	
WORLDWIDE, INC; CHAND & SAAJ	)	
HOSPITALITY, INC; RAMADA	)	
WORLDWIDE, INC; YASH ENTERPRISES,	)	
INC; HOWARD JOHNSON	)	
INTERNATIONAL, INC; NOOR HOTEL, LLC;	)	
AMBICA, LLC; OM, LLC; INDRA, LLC; AND	)	
G6 HOSPITALITY FRANCHISING, LLC,	)	
Defendants.	)	

**DEFENDANT RAJ KRUPA HOTEL, LLC’S JOINT MOTION TO STAY DEADLINE TO  
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Defendant Raj Krupa Hotel LLC (“Raj Krupa”), by and through its undersigned attorneys, and Plaintiff Nancy R. (“Plaintiff”) respectfully move the Court to stay the current deadline for Raj Krupa to answer or otherwise file motions pending the Court’s decision on Plaintiff’s pending Motion for Leave to Amend her complaint (Doc. 58).

On May 1, 2025, the Court granted Raj Krupa’s motion for extension of time (Doc. 16), allowing 60 days for Raj Krupa to answer or otherwise respond by June 29, 2025. In the time since entering its Order, other co-defendants have filed motions to dismiss, and Plaintiff filed its pending Motion for Leave to Amend her complaint (Doc. 58).

Should the Raj Krupa file an answer or other responsive pleading while Plaintiffs Motion for Leave to Amend is pending and the Court grant Plaintiff’s Motion for Leave to Amend her complaint, it may render moot any answer or other response to the lawsuit filed before then by Raj Krupa,

causing Raj Krupa to need to file another answer or responsive pleading regarding Plaintiff's First Amended Complaint.

In the interest of efficiency, Plaintiff and Raj Krupa hereby agree and jointly move the Court to extend Raj Krupa's time to respond to whichever complaint is the live complaint by seven (7) days following the Court's order granting or denying Plaintiff's Motion for Leave to Amend her complaint (Doc. 58).

Good cause exists to grant this requested stay and extension because it serves to both conserve the resources of the parties' and this Court. Granting this stay and extension will accommodate Raj Krupa to file an answer or motion to dismiss directed to the same pleading as the other Defendants. In addition, this will also allow Plaintiff to respond to Defendants' motions in a single omnibus brief.

Dated: June 27, 2025

Respectfully Submitted,

**FREEMAN MATHIS & GARY, LLP**

/s/ Alexander S. Gebert

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2025, I electronically transmitted the foregoing document to all parties' counsel in accordance with the Federal Rules of Civil Procedure.

/s/ Alexander S. Gebert  
Alexander S. Gebert